

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JOVANNA NETZAY DIAZ

NO. 3:25-mj-00182

MOTION FOR DETENTION AND
MOTION TO CONTINUE DETENTION HEARING

The United States moves for pretrial detention of defendant, Jovanna Netzay Diaz, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

Crime of violence (18 U.S.C. § 3156);
 Maximum sentence life imprisonment or death;
 10 + year drug offense;
 Felony, with two prior convictions in above categories;
 Serious risk defendant will flee;
 Serious risk obstruction of justice;
 Felony involving a minor victim;
 Felony involving a firearm, destructive device, or any other dangerous weapon; or
 Felony involving a failure to register (18 U.S.C. § 2250).

2. Reason for Detention: The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

Defendant's appearance as required;

Safety of any other person and the community

3. Rebuttable Presumption: The United States will invoke the rebuttable presumption against defendant because (check all that apply):

Probable cause to believe defendant committed 10+ year drug

offense or firearms offense, 18 U.S.C. § 924(c);

Probable cause to believe defendant committed a federal crime of
terrorism, 18 U.S.C. § 2332b(g)(5);

Probable cause to believe defendant committed an offense involving
a minor, 18 U.S.C. §§ 1201 and 2251; or

Previous conviction for "eligible" offense committed while on
pretrial bond.

4. Time for Detention Hearing: The United States requests the Court conduct the
detention hearing,

At first appearance

After continuance of 3 days (not more than 3).

Respectfully submitted,

CHAD E. MEACHAM
ACTING UNITED STATES ATTORNEY

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CERTIFICATE OF NON-SERVICE

I hereby certify that a true and correct copy of this document was filed via e-mail to the Court on this 28th day of February 2025.

/s/ Claire E. Demers
CLAIREE E. DEMERS
Assistant United States Attorney